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July 22, 2021

Via ECF

Honorable Alison J. Nathan, U.S.D.J.
Thurgood Marshall Courthouse
40 Foley Square, Courtroom 906
New York, NY 10007

The final pre-trial conference is hereby
ADJOURNED to July 26, 2021, at 1:00
p.m. The conference is to take place via
teleconference. Dkt. No. 73.
SO ORDERED.

Re: Zhang v. Sabrina USA Inc., et al. (Index No.: 1:18-cv-12332-AJN)

Dear Judge Nathan:

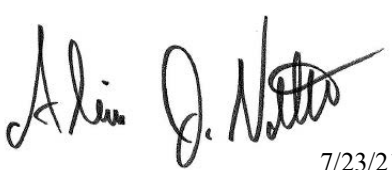
We represent all defendants (“Defendant”) in the above subject action. I write to respectfully request a short adjournment of the final pre-trial conference, currently scheduled for July 26, 2021. This is Defendants’ first request for an adjournment of the conference.

I have a potential scheduling conflict at 11:00 clock due to a motion oral argument before Judge Grossman at United States Bankruptcy Court for the Southern District of New York. Judge Grossman typically starts calendar call at 9:30am. However, my case (Case No.: 8-21-08050) is currently at No. 37 and 38. Therefore, there may potential be a scheduling conflict.

Plaintiff’s counsel happens to be the opposing counsel in the motion before Judge Grossman as well and is well aware of the potential scheduling conflict. However, Plaintiff refuses to consent to the proposed adjournment because another of their counsels would fill in to argue the motion before Judge Grossman in case of a scheduling conflict. Plaintiff’s counsel also refuses to adjourn the motion before Judge Grossman.

The trial is scheduled to commence on August 2, 2021, a week from July 26, 2021. Therefore, if we adjourn the final pre-trial conference by a short period of time, it would be of little prejudice to Plaintiff. Accordingly, we respectfully request a short adjournment of the final pre-trial conference. We are available in the afternoon of July 26, 2021 (Monday), the entire day of July 27, 2021 (Tuesday), in the morning of July 28, 2021 (Wednesday), in the morning of July 29, 2021 (Thursday), and the entire day of July 30, 2021 (Friday). We thank you for your time and valuable consideration.

Respectfully Submitted


7/23/21
SO ORDERED.
ALISON J. NATHAN, U.S.D.J.

/s/ Bingchen Li
Bingchen Li (BL4750)